

Dentistry For Kids
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Written Testimony for 2/18/25

To: The House Health and Government Operations Committee
Delegate Joseline A. Pena-Melnyk, Chair
241 Taylor House Office Building
6 Bladen Street
Annapolis, MD 21401

RE: HB 45 Dentist and Dental Hygiene Compact (DDH)

Dear Madame Chair and Health and Government Operations Committee:

I am Dr. Shari Kohn, a board-certified Pediatric Dentist in Maryland. I am representing the Maryland State Board of Dental Examiners in OPPOSITION of HB 45 – the Dentist and Dental Hygiene Compact.

This compact does NOT follow compacts that currently exist in medicine.

Of the two compacts being presented today, this compact has the most danger and risk and could potentially put the citizens of Maryland in danger. It grants the Dentist and Dental Hygienist a Privilege and NOT a license in our state.

The two main concerns that I will speak of are that HB 45 DOES **NOT** require 1. **graduation from a CODA (Commission on Dental Accreditation) approved Program**. And 2. This compact also DOES **NOT** require a “hands on” clinical examination for licensees.

CODA is the gold standard in dental education. CODA serves the public and dental professions by developing and implementing accreditation standards that promote and monitor the continuous quality and improvement of dental education programs.

“CODA accredits dental and dental-related education programs including advanced dental education programs and allied dental education programs in the United States. The Commission functions independently and autonomously in matters of developing and approving accreditation standards, making accreditation decisions on educational programs and developing and approving procedures that are used in the accreditation process. It is structured to include an appropriate representation of the communities of interest.”

The American Board of Dental Examiners (ADEX) has developed an exam that is considered to be the most comprehensive in **BOTH** didactic and hand skill examinations. “ADEX Dental and Dental Hygiene Examinations evaluate candidates’ psychomotor skills and didactic performance for entry-level practice.

“ADEX serves jurisdictions in the United States, Canada, Puerto Rico, and Jamaica in the pursuit of public health, safety, and welfare by ensuring that safe and competent dental care is provided by qualified dental practitioners. Originally, there were three large regional exam administration agencies, but through their shared missions they ultimately combined to become one agency, with one mission: hoping to lead to one national examination.”

“ADEX Membership gives a recognizing state dental board direct involvement in the development and evolution of the examinations through committee appointments; and approval of the final form of the examinations in dentistry and dental hygiene.”

Since this compact allows the applicant to obtain a PRIVILEGE from the state of Maryland – NOT a license, it does NOT allow the state dental board to require that the holders of this privilege satisfy Maryland’s educational requirements OR the continuing educational requirements.

Currently in order to practice dentistry in the US, foreign-trained dentists must meet the requirements of the state board of dentistry. These requirements include passing the National Board Examination (NBDE) and a state or regional practical exam.

HB 45 ignores these current state by state and board rules and regulations.

This compact essentially has the potential to **LOWER Maryland’s educational requirements** to practice dentistry and dental hygiene in our state. It also does **NOT** require a hand’s on test for the Dentist or Dental Hygienist. Maryland has one of the most thorough license requirements in the country. Other states, countries, and territories DO NOT. **Obviously, this is NOT in the best interest of YOUR constituents. It is definitely NOT consistent with the high standards of excellence we currently enjoy in our state.**

This compact will also **NOT allow** the state board to have **disciplinary actions** against these privilege holders for they are not licensed in the state of Maryland, and so they will NOT be considered to be within the state board’s jurisdiction.

A Compact privilege holders will originate and renew their status with the DDH commission - not the state of Maryland. In addition, this compact does NOT require a Home state. An

applicant could obtain a license from another state – an easier state with less requirements, get a privilege in Maryland, and ultimately drop their home state license. The home state is where educational requirements are met and they are able to be disciplined. Again, **NOT** meeting the **high standards** of our great state. Currently, in Maryland, when the board disciplines a licensee, we serve subpoenas and send investigators. How can this be done in an economically and convenient way if the privilege holder doesn't have a license in our state? This is very unclear at the very least.

This compact allows military personnel and their family members to be exempt from fees **ONLY** while on active duty – no longer. The alternative compact allows these same military personnel to be exempt when on active duty plus and **additional year**.

As with both compacts fees are required to join. This compact HB 45 has loose, non-specific language about fees. See section 7 (E) (3) *"The commission may levy on and collect an annual assessment from each participating **state** and impose fees on licensees of participating states when a compact privilege is granted"* Thus, essentially leaving an open checkbook for the state, the dental board, and the licensed dentist or dental hygienist. As in contrast to HB 534 Section 8 (B) *"A member state dental board issuing a compact license privilege authorizing practice in its state may impose a fee for a compact license privilege, for either initial issuance or any renewal."* This DDH compact has the potential to increase fees for every dentist and dental hygienist in the state, whereas the other Interstate compact will only incur fees to those who choose to participate. Other states that have participated in this compact have had to pay hundreds of thousands of dollars to the compact commission – thus passing on these costs to either the state, other licensees - that are not even participating in this compact, or BOTH.

Lastly, I feel that while we are responsible for the **well-being and safe care of all citizens** - as a Pediatric Dentist, **the children of our state are often the most vulnerable**. Pediatric Dentists employ the use of Nitrous Oxide, sedation, general anesthesia and other behavior management techniques. I am aware that many other states take these treatment alternatives are taken **less seriously** than we do here in Maryland. We have strict guidelines and permits are required to perform these services. I would be fearful of someone from another state, who does not possess the proper training or certification working on my child or yours. There is no defined rule as to whether or not privileged dentists or dental hygienists need to obtain said permits or certifications.

Since Pediatric Dentists believe that every child deserves dental care, 85% of Pediatric Dentists participate in medicaid. The medicaid certification "EPREP" requires that every participating dentist have a license. That being said, these new out of state dentists, cannot participate in medicaid as they have no license. That will not help the new adult medicaid program either.

While we all agree that facilitating the interstate practice of dentistry and dental hygiene is important, we **MUST agree that we need to do this safely and with the citizens of Maryland protected**.

For these reasons, I urge you to vote in OPPOSITION of HB 45 – the Dentist and Dental Hygiene Compact.

Respectfully,

Dr. Shari C. Kohn

Member – Maryland State Board of Dental Examiners

Executive Committee – Maryland Academy of Pediatric Dentistry

Fellow - American Academy of Pediatric Dentistry

Diplomat - American Board of Pediatric Dentistry

Fellow - American College of Pediatric Dentistry

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